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Attorney for United States of America

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA

JEREMIAH JAPHET,

Plaintiff,

vs.

CITY OF BETHEL; UNITED
STATES OF AMERICA; HEALTHY
SOLUTIONS STAFFING, LLC;
ROBERT CARTNER

Defendants,

CITY OF BETHEL,

Third-Party Plaintiff,

vs.

UNITED STATES of AMERICA, and
ERIC PETER,

Third-Party Defendants.

) Case No. 4:12-cv-00024-RRB

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) **UNITED STATES'**
) **NOTICE OF SETTLEMENT**
) **AND MOTION FOR**
) **TEMPORARY**
) **STAY OF DISCOVERY**

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The United States hereby notifies the Court that the United States and Plaintiff have reached a tentative settlement to resolve and dismiss all of Plaintiff's potential claims for liability and damages as to the United States in this action.

As a result of the tentative settlement, the United States moves the Court for an order granting the United States and Plaintiff a temporary stay of discovery, for 30 days, so that the parties can effectuate their settlement. The temporary stay will allow Plaintiff and the United States time to prepare the necessary settlement documents and file the required pleadings to dismiss Plaintiff's claims against the United States without incurring additional potentially unnecessary discovery expenses. If the tentative settlement is not finalized or is not effectuated, Plaintiff has agreed to grant the United States an extension of time to file its Final Witness List and Expert Disclosures.

Counsel for the United States has consulted with and advised Plaintiff's counsel that the government would file this Notice of Settlement. A proposed Order is attached for the Court's consideration.

RESPECTFULLY SUBMITTED on September 5, 2014.

KAREN L. LOEFFLER
United States Attorney

s/Gary M. Guarino
Assistant U.S. Attorney
Attorney for the United States

CERTIFICATE OF SERVICE

I hereby certify that on September 5, 2014,
a copy of the foregoing was served electronically on

David Henderson
Jim J. Valcarce
William H. Ingaldson

s/Gary M. Guarino

Japhet v. City of Bethel v. United States
Case No. 4:12-cv-00024-RRB

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